

I heartily support Rivers Alliance of Connecticut and the other environmental organizations listed in the following two-page statement urging that the Department of Environmental Protection proceed with consideration of the proposed streamflow regulations as an initial step toward instituting comprehensive planning and management of the state's water resources.

Joan S. Talbot
Washington, CT. 06793

Elaine Pratt
Bridgeport, CT. 06752

Stuart Daly
Roxbury CT

Jim Rogers
Weston, CT



Audubon Connecticut
Connecticut Forest and Park Association
Connecticut Fund for the Environment
Connecticut League of Women Voters
Farmington River Watershed Association
Housatonic Valley Association
The Nature Conservancy
Quinnipiac River Watershed Association
Rivers Alliance of Connecticut
Sierra Club Connecticut Chapter
Trout Unlimited



Contact:

Margaret Miner(RA) (203) 788-5161
Mary Mushinsky(QRWA) 203-430-0921
David Sutherland(TNC) 860-508-0222
Lynn Werner(HVA) 860-672-6678 or 860-927-4737

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CONNECTICUT ENVIRONMENTAL GROUPS UNITE FOR EFFECTIVE STREAMFLOW REGULATIONS

No River Left Behind

After forty years of waiting, environmental groups across the state agree that the streamflow regulations proposed by the Department of Environmental Protection (DEP) constitute the first and most essential step toward addressing Connecticut's water supply management problem. If we fail to complete and implement them, we are condemned to repeat our past: years of expensive case-by-case litigation.

- **A Long History of Effort Finally Shows Some Promise**

For decades, the General Assembly, other state officials and advocates have sought to provide streamflow protections. Then in 2005, the General Assembly updated prior, inadequate statutes by passing a law requiring the DEP to develop new regulations to protect both river flows and supply for all of society's various water needs. The draft regulations have the potential to be the first measure in 40 years to come close to meeting those goals.

These draft regulations were written to establish a clear set of environmental goals for the rivers and streams of Connecticut. We wish to ensure that these public-trust natural resources continue to provide the water to support our communities, our environment, and our economy. We also want them to survive as viable environmental habitats. Unless we have appropriate goals for the health of our rivers, we will continue to manage water in a piecemeal, first-come, first-served manner with no proper provisions for our environment or future water needs. *The need for reform of the state's management of water resources is not controversial. Taking this first step apparently still is for some. These regulations are the first step in the process of instituting comprehensive statewide water planning.*

- **This public process for the proposed streamflow regulations *must be allowed to proceed to conclusion*. This process allows the DEP to hear comments and make changes to the draft regulations that are necessary to benefit both the state's environment and water consumers.**

The draft regulations are good. Connecticut's environmental groups agree that these regulations put people first – they ensure that water needed for fire and other emergencies are not affected, that dams used for flood control are exempt, and that adequate water for communities will be available

during droughts. These regulations are based on the best available science and are responsive to extensive expert input from *all stakeholders*.

The draft regulations are not yet perfect, however. There are serious deficiencies which must be improved for both the environment and water suppliers. For example:

- As proposed, rivers designated Class 4 would have no environmental standards to protect them and would essentially be abandoned. We should leave no river without environmental standards.
- The regulations need to provide more flexibility to water suppliers by providing a less costly method to demonstrate compliance through site specific management plans.

Accordingly, we strongly support the adoption of regulations. We recognize that there are many improvements that will be proposed and many areas in which all stakeholders can find common ground. We look forward to DEP improving them through the public comment process. *But, we emphasize that now is the time to move forward, not backwards.*

- **Connecticut has enough water to go around – if we manage it wisely.**

With 45 inches of rainfall a year, Connecticut does not have a *water shortage*. We have enough water almost all of the time. Connecticut does, however, *have a water supply management problem*. We have built our water supply infrastructure without adequate attention to long term viability of our water supply sources – our freshwater aquifers and streams.

Most water utilities are operating with outdated business plans which depend on selling more and more water, at a time when most customers are trying to conserve. A rainy summer means an additional decline in water sales and revenue. Many leaders of both the water-supply industry and environmental organizations agree that reform is needed to provide for more stable revenue and infrastructure investment for water utilities, and protection for natural waters. *We are confident that this is what these regulations will do, at minimal and acceptable cost.*

- **What good is clean water if we allow our streams to run dry?**

Since the passage of the federal Clean Water Act almost 40 years ago, we as a state have invested in making sure that all Connecticut waters are clean and safe. We continue to make progress to achieve the national goal of fishable and swimmable waters. But these investments will fall short if we don't equally ensure that we keep sufficient water in the rivers. *What good are clean water goals if there is too little water in the river to accomplish them?*

Through this regulations process, DEP is developing science-based environmental standards to protect the flows and water levels in Connecticut's rivers and streams. These flow regulations offer the opportunity to put in place a balanced, reasonable, and long-awaited measure to protect river flows and water levels with flexible requirements reflecting modern science and substantial input from water suppliers and other water users.

- **We are committed to a water management approach which provides clean, safe and sustainable water for our communities, our economy and our environment.**

These regulations will improve the transparency and predictability of the regulatory system and will help guide future water supply development to the most appropriate areas.

We pledge to work with all interested parties to improve the proposed regulations. But, now that we have invested four years in this process, we must go forward with them and ensure that strong, effective, and balanced regulations are completed and then implemented.